



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2

290 BROADWAY

NEW YORK, NY 10007-1866

MAR 21 2019

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

**Article Number: 7018 2290 0000 4961 0621**

Mr. Vincent Kopicki, Commissioner  
Westchester County Department of Environmental Facilities  
270 North Avenue, 6<sup>th</sup> Floor  
New Rochelle, New York 10801

Re: **Information Request and Administrative Compliance Order**  
**Docket No. CWA-02-2019-3021**  
**Westchester County DEF Yonkers Joint Collection System**  
**SPDES Permit No. NY0026689**

Dear Mr. Kopicki:

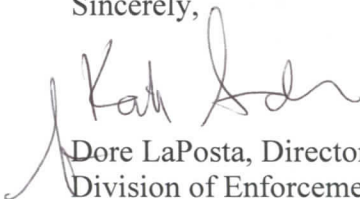
Please find enclosed the Information Request and Administrative Compliance Order (together the "Order"), Docket No. CWA-02-2019-3021, which the United States Environmental Protection Agency ("EPA"), Region 2, is issuing Westchester County ("County") pursuant to Section 309(a) of the Clean Water Act ("CWA"), 33 U.S.C. § 1319(a). The EPA is issuing the Order because the County has violated and remains in a state of noncompliance with CWA Section 301, 33 U.S.C. § 1311, for unpermitted discharges and failure to comply with the conditions and limitations of the New York State Department of Environmental Conservation ("NYSDEC") State Pollutant Discharge Elimination System ("SPDES") Permit No. NY0026689.

Please acknowledge receipt of this Order by signing the acknowledgment page and returning the acknowledgment page by mail in the enclosed envelope. Failure to comply with the enclosed Order may subject Respondent to additional civil/criminal penalties pursuant to Section 309 of the CWA and subject Respondent to ineligibility for participation in work associated with Federal contracts, grants or loans.

Also enclosed is the Compliance Evaluation Inspection ("CEI") report detailing the findings and observations of the CEI conducted by EPA on February 13, 2019.

If you have any questions regarding the enclosed Order, please contact Douglas McKenna, Chief, Water Compliance Branch, at (212) 637-4244.

Sincerely,



Dore LaPosta, Director  
Division of Enforcement and Compliance Assistance

Enclosures

cc: Director, Bureau of Water Compliance Programs, NYSDEC w/ enclosure  
Regional Water Engineer, NYSDEC Region 3 w/enclosure  
Meena George, NYSDEC Region 3 ([meena.george@dec.ny.gov](mailto:meena.george@dec.ny.gov))

**UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION 2**

**IN THE MATTER OF:**

Westchester County  
Department of Environmental Facilities  
270 North Avenue  
New Rochelle, NY 10801

Proceeding pursuant to Sections 308(a) and  
309(a)(3) of the Clean Water Act, 33 U.S.C.  
§§ 1318(a) and 1319(a)(3)

**RESPONDENT**

**INFORMATION REQUEST AND  
ADMINISTRATIVE  
COMPLIANCE ORDER**

**CWA-02-2019-3021**

The following Information Request and Administrative Compliance Order (together the “Order”) are issued pursuant to Sections 308(a) and 309(a)(3) of the Clean Water Act (“CWA” or “Act”), 33 U.S.C. §§ 1318(a) and 1319(a)(3). This authority has been delegated by the Administrator of the United States Environmental Protection Agency (“EPA”) to the Regional Administrator, EPA Region 2, and since further redelegated to the Director, Division of Enforcement and Compliance Assistance, Region 2, EPA.

**A. LEGAL AUTHORITY**

1. Section 301(a) of the CWA, 33 U.S.C. § 1311(a), makes it unlawful for any person to discharge any pollutant from a point source to waters of the United States, except, among other things, with the authorization of, and in compliance with, a National Pollutant Discharge Elimination System (“NPDES”) permit issued pursuant to Section 402 of the CWA, 33 U.S.C. § 1342.
2. Section 402 of the CWA, 33 U.S.C. § 1342, authorizes the Administrator of the EPA to issue a NPDES permit for the discharge of any pollutant, or combination of pollutants, subject to certain requirements of the CWA and conditions which the Administrator determines are necessary. The New York State Department of Environmental Conservation (“NYSDEC”) is the agency with the authority to administer the federal NPDES program in New York pursuant to Section 402(b) of the CWA, 33 U.S.C. § 1342(b). Under this authority, a State Pollutant Discharge Elimination System (“SPDES”) permit issued by the NYSDEC is required for the discharge of pollutants from point source to a navigable water of the United States. EPA maintains concurrent enforcement authority with authorized States for violations of the CWA and permits issued by authorized States thereunder.
3. “Person” is defined by Section 502(5) of the CWA, 33 U.S.C. § 1362(5), to include an individual, corporation, partnership, association or municipality.

4. "Municipality" is defined by Section 502(4) of the CWA, 33 U.S.C. § 1362(4), to include among other things, a Town, borough, county, parish, district, association, or other public body created by or pursuant to State law and having jurisdiction over disposal of sewage, industrial wastes, or other wastes.
5. "Discharge of a pollutant" is defined by Section 502(12) of the CWA, 33 U.S.C. § 1362(12), to include any addition of any pollutant to navigable waters from any point source.
6. "Pollutant" is defined by Section 502(6) of the CWA, 33 U.S.C. § 1362(6), to include among other things, solid waste, dredged spoil, rock, sand, cellar dirt, sewage, sewage sludge and industrial, municipal and agricultural waste discharged to water.
7. "Point source" is defined by Section 502(14) of the CWA, 33 U.S.C. § 1362(14), to include any discernible, confined and discrete conveyance, including but not limited to any pipe, ditch, channel, tunnel, conduit, well, discrete fissure, container, rolling stock, concentrated animal feeding operation, or vessel or other floating craft, from which pollutants are or may be discharged.
8. "Navigable waters" is defined by Section 502(7) of the CWA, 33 U.S.C. § 1362(7), as the waters of the United States, including the territorial seas, and, at the time of the violations at issue here, "waters of the United States" was defined by 40 C.F.R. § 122.2, to include: all waters which are currently used, were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide; all interstate waters, including interstate "wetlands;" all other waters such as intrastate lakes, rivers, streams (including intermittent streams), mudflats, sandflats, "wetlands," sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds the use, degradation, or destruction of which would affect or could affect interstate or foreign commerce, including tributaries thereto.
9. "Owner or operator" is defined by 40 C.F.R. § 122.2, as the owner or operator of any "facility or activity" subject to regulation under Section 402 of the CWA, 33 U.S.C. § 1342(a).
10. Section 308(a) of the CWA, 33 U.S.C. § 1318(a), provides, in relevant part, that the Administrator of the EPA may require the owner or operator of any point source to, among other things: establish and maintain such records; make such reports; install, use and maintain such monitoring equipment; sample such effluents; and provide such other information as may reasonably be required to carry out the objective of the CWA.
11. Section 309(a) of the CWA, 33 U.S.C. § 1319(a), authorizes the Administrator to issue an order requiring compliance or commence a civil action when any person is found to be in violation of Section 301 of the CWA, 33 U.S.C. § 1311, or in violation of any permit condition or limitation in a permit issued under Section 402 of the CWA, 33 U.S.C. § 1342.

## **B. FINDINGS OF FACT AND CONCLUSIONS OF LAW**

1. Westchester County ("County" or "Respondent") is a public body established under the laws of the State of New York that owns and operates a Combined Sewer System ("CSS") and a Sanitary Sewer System ("SSS") collection system tributary to the Westchester County Department of Environmental Facilities ("WCDEF") Yonkers Joint Wastewater Treatment Plant ("WWTP").

2. Respondent is a municipality and a person under Sections 502(4) and 502(5) of the CWA, 33 U.S.C. §§ 1362(4) and 1362(5).
3. The County-operated CSS and SSS includes pump stations, interceptors, force mains, gravity sewer lines, manholes, regulators, tide gates and solids/floatables capture facilities, and is used for collecting and conveying sanitary wastewaters (domestic, commercial and industrial wastewaters) and stormwater to the WCDEF Yonkers Joint WWTP.
4. The current SPDES Permit No. NY0026689 became effective on June 1, 2014 and expires on May 31, 2019 (“Permit”).
5. SPDES Permit No. NY0026689 authorizes Respondent to discharge pollutants from thirteen (13) Combined Sewer Overflow (“CSO”) outfalls, which are point sources from which Respondent discharges sewage and other pollutants to the Hudson River, under the conditions and limitations prescribed in the permit.
6. Sanitary Sewer Overflows (“SSOs”) from the County’s SSS collection system discharge to the Hutchinson River, Saw Mill River and Hudson River and are not authorized under a SPDES permit.
7. The Hudson River, Hutchinson River and Saw Mill River, are waters of the United States under Section 502(7) of the CWA.
8. Respondent has been covered by the conditions and limitations in SPDES Permit No. NY0026689 at all relevant times addressed by this Information Request and Administrative Compliance Order.
9. On February 13, 2019, the EPA conducted a Compliance Evaluation Inspection (“CEI”) of the Respondent’s WCDEF Yonkers Joint collection system.
10. Based on the inspection findings, the EPA finds Respondent has failed to comply with the conditions and limitations of SPDES Permit No. NY0026689, including, but not limited to, the following:
  - a. Permit Limits, Levels and Monitoring – North and South Swirls on page 7 of the Permit includes effluent limits for Outfalls 002 and 003. According to the County’s submitted Discharge Monitoring Reports (“DMRs”), effluent limitations were exceeded on three (3) occasions for Outfall 002 and on four (4) occasions for Outfall 003, in the past five (5) years, in violation of the Permit.
  - b. Best Management Practices for Combined Sewer Overflows (BMPs for CSOs) Number 1: CSO Maintenance/Inspection on page 15 of the Permit requires the County to conduct routine inspections of CSO structures, including weekly CSO regulator inspections and maintenance. CSO regulator weirs had not been adequately inspected or maintained by County personnel, based on EPA observations at the time of the inspection and documentation provided by the County, in violation of the Permit.
  - c. BMPs for CSOs Number 1: CSO Maintenance/Inspection on page 15 of the Permit states that regulator inspection reports shall be completed indicating visual inspection, any observed flow, incidence of rain or snowmelt, condition of equipment and work required.



Upon review of the regulator inspection reports provided by the County from January 2017 through February 2019, only six (6) of the 109 reports included incidence of rain or snowmelt. The reports did not document flow or visual inspection or condition of the regulators, in violation of the Permit.

- d. BMPs for CSOs Number 2: Maximum Use of Collection System for Storage on page 15 of the Permit requires the County to utilize the maximum amount of in-system storage capacity to minimize CSOs. In addition, page 1 of the Permit requires the County to comply with 6 NYCRR Parts 750-1.2(a) and 750-2 which requires the County to, at all times, properly operate and maintain all disposal facilities, which are installed or used by the permittee to achieve compliance with the conditions of the permit. At the time of the inspection, EPA identified tidal intrusion into the collection system at two (2) regulators (Wells Avenue and Ashburton Avenue) and had not inspected or maintained the entire trunk sewer in the CSO area, indicating inadequate operation and maintenance of disposal facilities and potential reductions in-system storage capacity, in violation of the Permit.
- e. BMPs for CSOs Number 6: Prohibition of Dry Weather Overflow on page 16 of the Permit prohibits dry weather overflows (“DWOs”). The County reported to the State three (3) DWO discharges from its system in the past five (5) years, resulting in the discharge of approximately 2,270,000 gallons of partially treated sewage to the Hudson River during dry weather, in violation of the Permit.
- f. BMPs for CSOs Number 13: Public Notification on page 17 of the Permit requires the County to install and maintain identification signs at all CSO outfalls owned and operated by the County. At the time of the inspection, County representatives stated that identification signs for CSO Outfalls 025 (Wells Avenue) and 010 (Ashburton Avenue) had been removed due to construction activity in the immediate areas, in violation of the Permit.
- g. Discharge Notification Requirements on page 19 of the Permit states that the County shall periodically inspect the outfall identification sign(s) in order to ensure they are maintained, are still visible, and contain information that is current and factually correct. In addition, the County shall retain records for a minimum period of 5 years in accordance with 6NYCRR Part 750-1.12(b)(2) and Part 750-2.5(c)(1). According to County representatives, outfall signs are inspected annually, however, the County was unable to provide documentation of previously conducted annual CSO outfall sign inspections, in violation of the Permit.
- h. Page 2 of the Permit states that bypasses from seven (7) bypass outfalls are not allowed except in accordance with regulations at 6NYCRR Part 750-2.8(b)(2). In addition, page 1 of the Permit requires the County to comply with 6 NYCRR Parts 750-1.2(a) and 750-2 which requires the County to, at all times, properly operate and maintain all disposal facilities, which are installed or used by the permittee to achieve compliance with the conditions of the permit. Observation at the time of the inspection indicate that the County has not adequately inspected or maintained the bypass outfalls, in violation of the Permit.
- i. Page 1 of the Permit requires the County to comply with 6 NYCRR Parts 750-1.2(a) and 750-2 which requires the County to, at all times, properly operate and maintain all disposal facilities, which are installed or used by the permittee to achieve compliance with the conditions of the permit. According to County representatives, air release valves associated with County force mains are scheduled to be inspected and exercised at least annually.

According to work orders provided by the County, air release valves were not inspected and exercised in 2018 (with the exception of Mount Kisco, in violation of the Permit.

11. The County reported to the State, seven (7) Sanitary Sewer Overflow (SSO) discharges from its system in the past five (5) years, resulting in the discharge of approximately 49,000 gallons of untreated sewage to waterbodies; the Hudson River, Hutchinson River and Saw Mill River. Each of these SSO discharges are not permitted by a NPDES/SPDES permit.
12. Based upon Paragraphs 1 - 11 above, EPA finds that Respondents are in violation of Sections 301 and 402 of the CWA, 33 U.S.C. §§ 1311 and 1342, and applicable implementing regulations.

### C. ORDERED PROVISIONS

Based upon the foregoing and pursuant to the authority of Section 309(a)(3) of the Act, it is hereby ORDERED that:

1. **Immediately** upon receipt of the original copy of the Order, responsible officials of Respondents shall complete and sign the acknowledgment of receipt of the Order and return the acknowledgment page to the Chief, Water Compliance Branch, in the enclosed envelope to the address listed in paragraph E.1, below.
2. Respondent shall complete the following items in accordance with the schedule listed below:

COMPLIANCE SCHEDULE	
Item	Completion Deadline
i. Comply with effluent limits for Outfalls 002 and 003	<b>Immediately</b>
ii. Eliminate Dry Weather Overflows and Sanitary Sewer Overflows	<b>Immediately</b>
iii. Inspect and document, on an at least weekly basis, all CSO regulator weirs and tide gates and maintain as necessary, provide EPA with documentation, including photographs depicting the inspected and maintained regulator weirs.	<b>Within seven (7) calendar days of receipt</b>
iv. Develop and implement a bypass outfall inspection program, that includes a routine physical inspection of all bypass outfalls, valves and weirs to prevent incidence of overflows, documentation of overflow and ensure the integrity of valves, submit documentation, including photographs and confirmation of the condition of each bypass and any associated valves and weirs.	<b>No later than 7/1/2019</b>
v. Inspect and document all outfall signs at least annually	<b>No later than 8/1/2019</b>
vi. Install and maintain identification signs at all outfalls, submit photographic documentation of all CSO outfall signs in place that are easily readable by the public (from both the water side and land side), including Wells Avenue (025) and Ashburton Avenue (010).	<b>No later than 9/1/2019</b>

vii. Implement at least annual force main air release valve inspections and maintenance as necessary. Submit documentation that all County air release valves had been inspected in 2019.	<b>No later than 12/31/2019</b>
viii. Complete inspection and cleaning of all remaining trunk sewer lines within the Combined Sewer area, including, "North Yonkers (CSO Area)" and "South Yonkers C". Submit documentation of completion along with associated costs to EPA	<b>No later than 12/31/2020</b>
ix. Complete repair and/or replacement of all tide gates to ensure that each seal completely, submit photographic and written documentation along with costs of each repaired/replaced tide gate and the regulator weir during high tide.	<b>No later than 12/31/2020</b>

#### **D. INFORMATION REQUEST**

Based upon the foregoing and pursuant to the authority of Section 308(a) of the CWA, 33 U.S.C. § 1318(a), within **sixty (60) calendar days** of receipt of this Order, Respondents shall submit to EPA, with a copy to NYSDEC, the following:

1. A written response detailing how the Respondent has addressed the effluent limit exceedances, SSOs, DWOs and the missing DMR report noted in items 1, 5, 8, and 11 of the **Potential Noncompliance** section of the enclosed CEI Report; and
2. A written response with how the Respondent has addressed each of the **Areas of Concern** listed in the enclosed CEI Report.

#### **E. GENERAL PROVISIONS**

1. All information or documents required to be submitted by Respondent as part of this Order shall be sent by certified mail or its equivalent to the following addresses:

Doughlas McKenna, Chief  
Water Compliance Branch  
Division of Enforcement and Compliance Assistance  
U.S. Environmental Protection Agency - Region 2  
290 Broadway, 20<sup>th</sup> Floor  
New York, New York 10007-1866

and

Ed Hampston, Director  
Bureau of Water Compliance Programs  
Division of Water, NYSDEC  
625 Broadway  
Albany, New York 12233-3506



2. Pursuant to 40 C.F.R. § 122.22, all information or documents required to be submitted by Respondent shall be signed by an authorized representative(s) of Respondent, and shall include the following certification:

“I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.”

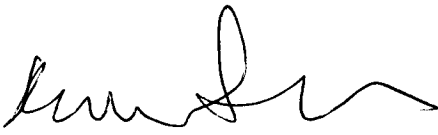
3. Respondent shall have the opportunity, for a period of twenty (20) days from the date of receipt of this Order, to confer regarding the Ordered Provisions, with the following designated Agency representative:

Doughlas McKenna, Chief  
Water Compliance Branch  
Division of Enforcement and Compliance Assistance  
U.S. Environmental Protection Agency - Region 2  
290 Broadway, 20<sup>th</sup> Floor  
New York, New York 10007-1866  
(212) 637-4244

4. Respondent has the right to seek immediate federal judicial review of the Order pursuant to Chapter 7 of the Administrative Procedure Act (“APA”), 5 U.S.C. §§ 701-706. Section 706 of the APA provides the grounds for such review.
5. This Order does not constitute a waiver from compliance with, or a modification of, the effective terms and conditions of the CWA, its implementing regulations, or any applicable permit, which remain in full force and effect. This Order is an enforcement action taken by the EPA to ensure swift compliance with the CWA. Issuance of this Order shall not be deemed an election by the EPA to forego any civil or criminal actions for penalties, fines, imprisonment, or other appropriate relief under the CWA.
6. Notice is hereby given that failure to comply with the terms of the CWA Section 309(a)(3) Compliance Order may result in your liability for civil penalties for each violation of up to \$54,833 per day under Section 309(d) of the CWA, 33 U.S.C. § 1319(d), as modified by 40 C.F.R., Part 19. Upon suit by the EPA, the United States District Court may impose such penalties if, after notice and opportunity for hearing, the Court determines that you have violated the CWA as described above.
7. Notice is hereby given that failure to comply with the requirements of the CWA Section 308 Information Request may result in your liability for civil penalties for each violation of up to \$54,833 per day under Section 309(d) of the CWA, as modified by 40 C.F.R. Part 19. Upon suit by the EPA, the United States District Court may impose such penalties if, after notice and opportunity for a hearing, the Court determines that you have failed to comply with the terms of the Information Request. You may also be subject to administrative remedies for a failure to comply with the Information Request as provided by Section 309 of the CWA.

8. If any provision of this Order is held by a court of competent jurisdiction to be invalid, any surviving provisions shall remain in full force and effect.
9. This Order shall become effective upon the date of execution by the Director, Division of Enforcement and Compliance Assistance.

Dated: MAR 21 2019

Signed: 

Dore LaPosta, Director  
Division of Enforcement and Compliance Assistance

**UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION 2**

**IN THE MATTER OF:**

Westchester County  
Department of Environmental Facilities  
270 North Avenue  
New Rochelle, NY 10801

Proceeding pursuant to Sections 308(a) and  
309(a)(3) of the Clean Water Act, 33 U.S.C.  
§§ 1318(a) and 1319(a)(3)

**RESPONDENT**

**INFORMATION REQUEST AND  
ADMINISTRATIVE  
COMPLIANCE ORDER**

**CWA-02-2019-3021**

**ACKNOWLEDGMENT OF RECEIPT OF  
INFORMATION REQUEST AND ADMINISTRATIVE COMPLIANCE ORDER**

I, \_\_\_\_\_, an authorized representative(s) of the Respondent, with

the title of, \_\_\_\_\_, do hereby acknowledge the receipt of copy of the

INFORMATION REQUEST AND ADMINISTRATIVE COMPLIANCE ORDER, CWA-02-2019-  
3021.

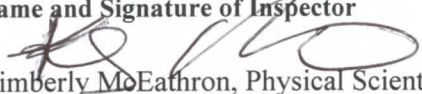
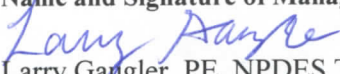
DATE: \_\_\_\_\_

SIGNED: \_\_\_\_\_



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION 2**  
**Division of Enforcement and Compliance Assistance**  
**Water Compliance Branch**

**Clean Water Act (CWA) Inspection Report**

<b>Program:</b> Combined Sewer System	<b>Inspection Type:</b> Compliance Evaluation Inspection	
<b>Permittee Name:</b> Westchester County	<b>NPDES/ICIS No.:</b> NY0026689	
<b>Inspection Entry Date:</b> 2/13/2019	<b>Inspection Exit Date:</b> 2/13/2019	
<b>Inspection Entry Time:</b> 8:30 AM	<b>Inspection Exit Time:</b> 4:00 PM	
<b>Facility Inspected:</b> Westchester County DEF – Yonkers District 19 Alexander Street Yonkers, NY 10701		
<b>Lat, Long:</b> 40.937652, -73.902426 <b>NAICS / SIC Code:</b> 221320 Sewage Treatment Facilities / 4952 – Sewerage Systems		
<b>EPA Representative(s):</b> Kimberly McEathron, USEPA Region 2, 212-637-4228, <a href="mailto:mceathron.kimberly@epa.gov">mceathron.kimberly@epa.gov</a>		
<b>State Representative(s):</b> Meena George, NYSDEC Region 3, 914-428-2505 x359, <a href="mailto:meena.george@dec.ny.gov">meena.george@dec.ny.gov</a>		
<b>On-Site Facility Representative(s):</b> Michael J. Facelle, P.E., Director of Maintenance, WCDEF, 914-813-5449, <a href="mailto:mjf3@westchestergov.com">mjf3@westchestergov.com</a> ; Marian Pompa, Jr., P.E., Associate Engineer, WCDEF, 914-813-5419, <a href="mailto:mpp1@westchestergov.com">mpp1@westchestergov.com</a> ; Joseph LaBella, Superintendent of Maintenance, WCDEF, (914) 755-1807		
<b>Responsible Official:</b> Vincent Kopicki, Commissioner, WCDEF, 270 North Avenue, 6 <sup>th</sup> Floor, New Rochelle, New York 10801 <a href="mailto:vxk2@westchestergov.com">vxk2@westchestergov.com</a>		
<b>Name and Signature of Inspector</b>  Kimberly McEathron, Physical Scientist	<b>Agency/Office/Phone Number</b> USEPA/DECA-WCB/212-637-4228	<b>Date</b> 3/12/2019
<b>Name and Signature of Management QA Reviewer</b>  Larry Gaugler, PE, NPDES Team Leader	<b>Agency/Office/Phone Number</b> USEPA/DECA-WCB/212-637-3950	<b>Date</b> 3/14/19

**I. INTRODUCTION:**

On February 13, 2019, the United States Environmental Protection Agency (EPA), Region 2, conducted a Combined Sewer System (CSS) and Sanitary Sewer System (SSS) Compliance Evaluation Inspection (CEI or “inspection”) of the Westchester County Department of Environmental Facilities (WCDEF or County) Yonkers Joint collection system. Mr. Michael Facelle, Director of Maintenance, Mr. Marian Pompa, Associate Engineer and Mr. Joseph LaBella, Superintendent of Maintenance were present at the time of the inspection and primarily represented the WCDEF. Ms. Kimberly McEathron, of EPA Region 2, led the CEI, presented credentials to WCDEF representatives upon arrival and held an opening conference prior to conducting the inspection. Weather conditions at the time of the CEI were dry and approximately 40°F.

The County has coverage under a New York State Department of Environmental Conservation (NYSDEC) State Pollutant Discharge Elimination System (SPDES) Discharge Permit, SPDES ID No. NY0026689, which became effective on June 1, 2014 and expires on May 31, 2019 (“Permit”). The County’s Permit authorizes the discharge of treated effluent from the WCDEF Yonkers Joint Wastewater Treatment Plant (WWTP) to the Hudson River via Outfalls 001 and 001A in addition to thirteen (13) Combined Sewer Overflow (CSO) outfalls (002, 003, 008, 010, 014, 015, 016, 017, 018, 021, 022, 025 and 030) and seven (7) stormwater outfalls (031, 032, 033, 034, 035, 036 and 037), under the conditions and limitations of the Permit.

## **II. INSPECTION FINDINGS:**

### **Collection System:**

1. The WCDEF Yonkers Joint WWTP treats sanitary sewage from approximately 509,921 residents within twenty-two (22) communities (Cities of Mount Vernon, New Rochelle, White Plains, and Yonkers; Towns of Bedford, Greenburgh, Mount Pleasant, Mount Kisco, New Castle, North Castle; Villages of Ardsley, Briarcliff Manor, Bronxville, Dobbs Ferry, Elmsford, Hastings, Irvington, Pleasantville, Scarsdale, Sleepy Hollow, Tarrytown, and Tuckahoe) in seven (7) sewer districts (Bronx Valley, Central Yonkers, Hutchinson, North Yonkers, Saw Mill, South Yonkers and Upper Bronx Valley).
2. Sanitary sewage that enters the County's collection system is conveyed to the WCDEF Yonkers Joint WWTP, except for combined sewage that discharges from CSO outfalls during wet weather events.
3. According to County representatives and documentation provided, the County's collection system receives sanitary sewage from separately sewered systems, except for the City of Yonkers. Approximately four (4) square miles on the west side of the City of Yonkers is a combined sewer system.
4. According to County representatives and documentation provided, the WCDEF Yonkers Joint collection system consists of approximately 2,000 manholes, 88.5 miles of gravity sewers and 11.5 miles of force mains. The Yonkers Joint service area includes approximately 108 square miles.
5. According to County representatives, flows are metered and documented at the North Yonkers pump station and discharges are monitored at two (2) CSO swirl concentrators (Outfalls 002 and 003). According to County representatives, flows at the remaining pump stations can be determined by viewing chart recorders or calculating flows from pump run hour readings.
6. According to the County's CMOM, the WCDEF Yonkers Joint WWTP has an average flow of 80.2 million gallons per day (MGD), with peak wet weather flow of 150 MGD, a design flow of 120 MGD and a hydraulic capacity of 330 MGD.
7. The County has legislation limiting inflow and infiltration (I/I) and sewage rates to 150 gallons per capita per day from the satellite communities. According to County representatives, the County has not monitored flow from satellite systems to the Yonkers Joint WWTP and is not aware of flow exceedances at this time. The County has conducted a flow monitoring and reduction program with Long Island Sound communities and is in the process of completing a flow monitoring program with WCDEF Peekskill WWTP satellite communities. According to County representatives, the County doesn't have set plans at this time to study the Yonkers Joint collection system communities.
8. At the time of the inspection and immediately after the inspection, the County provided EPA with schematics and maps depicting the position of County trunk sewers, force mains, gravity sewers, pump stations and outfall pipes associated with the WCDEF Yonkers Joint collection system.
9. According to County representatives, within the Yonkers Joint collection system the County owns, operates and maintains regulator structures upstream from eleven (11) CSO outfalls, weirs at two (2) CSO swirls and an additional nine (9) regulators located upstream from other regulators in the collection system.
10. The County owns, operates and maintains tide gates downstream from five (5) regulators (Lamartine Avenue - 008, Ashburton Avenue - 010, Pier Street - 018, Main Street - 022 and Wells Avenue - 025).



According to County representatives, the regulator structures located in higher elevations are not equipped with tide gates.

11. The County owns, operates and maintains two (2) CSO swirl concentrators that partially treat wet weather CSO discharges prior to discharge into the Hudson River, in accordance with SPDES permit requirements, which includes monitoring requirements and effluent limits. The CSO swirl concentrators are located at the North Yonkers pump station (Outfall 003) and at the South Yonkers screening facility (Outfall 002) on Valentine Lane. The partial treatment associated with the CSO swirl concentrators consists of bar screens and grit removal, floatables removal and settleable solids removal in addition to chlorine disinfection.
12. The County currently owns, operates and maintains twelve (12) pump stations in the County's Yonkers Joint WWTP collection system. Details for each station are listed in the table below:

<b>Sewer District</b>	<b>Pump Station</b>	<b>Avg. Flow (MGD)</b>	<b>Bypass Outfall</b>	<b>Combined Sewage Flows</b>
Bronx Valley	Sprain Lift	0.06	N/A	No
	Jackson Ave (Sprain Brook)	0.4	007	No
Hutchinson Valley	Hutchinson	4.9	N/A	No
North Yonkers	Alexander Street	0.84	N/A	Yes
	Dobbs Ferry	0.004	004	No
	Hastings	0.15	005 and 006	No
	Irvington	0.85	026	No
	North Yonkers	28	N/A	Yes
Saw Mill Valley	Briarcliff	0.37	N/A	No
	Tarrytown	3.0	028 and 029	No
South Yonkers	Ludlow Street	0.36	N/A	Yes
	Main Street	0.7	N/A	Yes

13. According to County representatives, the Mount Kisco pump station is operated by the Town of Mount Kisco but the force main associated with it, is operated and maintained by the County.
14. According to County representatives, the County owns, operates and maintains approximately twenty-seven (27) air release valves located on County force mains.
15. According to the County's SPDES permit, the County owns and operates seven (7) bypass outfalls located at or near pump stations (Dobbs Ferry – 004, Hasting on Hudson – 005 and 006, Jackson Avenue – 007, Buckout Street – 026, River Street – 028 and Depot Plaza – 029). The County's SPDES Permit states that bypasses from these outfalls are not allowed except in accordance with regulations at 6 NYCRR Part 750-2.8(b)(2). County representatives stated that they were unaware of these bypass outfalls ever being used to discharge.
16. The County has a Capacity, Management, Operation, and Maintenance (CMOM) plan dated November 2016 and updated November 2018, for operating and maintaining the collection system.

**CSO Maintenance/Inspection:**

17. According to County representatives, all pump stations are inspected daily and are monitored and alarmed utilizing Supervisory Control and Data Acquisition (SCADA). According to County representatives, the North Yonkers pump station and the Tarrytown pump station are manned 24 hours a day, seven days a week and during the day a crew is stationed at the Hutchinson pump station. According to County representatives, all pump stations are equipped with on-site emergency power generators.
18. According to County representatives, force main air release valves are scheduled to be inspected and exercised at least annually and maintenance is documented utilizing the work order system.
19. At the time of the inspection, the County representatives were unsure of the configuration, position and location of each of the bypass outfalls listed in the Permit. In addition, County representatives were unable to demonstrate that these bypass outfalls had been inspected, maintained or monitored to ensure that no discharges had occurred. County representatives stated that the bypass outfalls are valved but were unaware of the condition or location of all valves. The County clarified that at least one of these bypass locations is not valved (Bypass Outfall 005).
20. According to County representatives and documentation provided, the County inspects CSO regulators and tide gates every non-holiday week day and documents the inspection on an inspection form.

**Maximum Use of Collection System for Storage:**

21. The County owns a root cutter, Closed-Circuit Television (CCTV) equipment, Vactor truck, jet/vac truck and easement machine for collection system maintenance. According to County representatives, the County is in the process of implementing a phased cleaning and inspection program of all County gravity sewer lines. According to the County's CMOM, 38 linear feet of trunk sewer servicing the Hutchinson SSS district was cleaned and inspected in 2017. In addition, 180 tons of material were removed from the County's trunk sewer in Sleepy Hollow, according to County representatives. According to documentation provided by the County, all County trunk sewers located in a combined sewer area have been cleaned and inspected between 2009 and 2018, except for "South Yonkers C" and "North Yonkers" segments. According to County representatives and the County's 2018 Annual Report, the County plans on inspecting and cleaning the remaining combined sewer area segments in 2020.
22. The County has developed a list of trouble spots for routine inspection and cleaning. There are two (2) trouble spot within the Yonkers Joint SSS at River Street in Hastings and the Kinderogan sewer in Mount Pleasant, that are slated for specific frequency of cleaning on a monthly and annual basis, respectively. In addition, there is one (1) trouble spot listed located in a combined sewer section of the system in Yonkers (Wells Avenue) where inspections are conducted on an "as needed" frequency due to identified problems with debris accumulation.
23. As stated previously, County owns, operates and maintains tide gates at five (5) regulator structures to prevent river water and tidal intrusion.

**Prohibition of Dry Weather Overflows and Sanitary Sewer Overflows:**

24. The County has a Sewer Overflow Response Plan (SORP) dated revised November 2018 and includes procedures for responding to and reporting overflows utilizing the NYAlert system.

25. Sanitary sewer system spills and dry weather overflows would ultimately discharge into the Hudson River or Hudson River tributaries.
26. According to the NYAlert database, in the past five (5) years the County has reported three (3) Dry Weather Overflows (DWOs) from the County's CSS which resulted in the discharge of partially treated sewage to a waterbody from a CSO outfall. Details regarding the three (3) reported DWOs are summarized in the Table below:

<b>Date</b>	<b>Location</b>	<b>Description</b>	<b>Gallons</b>	<b>Receiving Waterbody</b>
04/22/2017	North Yonkers Pumping Station	Electrical malfunction and power outage resulted in a dry weather discharge of partially treated with disinfection sewage to the Hudson River	1,170,000	Hudson River
02/09/2018	North Yonkers Pumping Station	Loss of water due to a water main break causing a pressure alarm, shutting down sewage pumps, resulting in a dry weather discharge of partially treated with disinfection sewage to Hudson River	120,000	Hudson River
11/30/2018	North Yonkers Pumping Station	Electrical mechanical failure resulted in a dry weather discharge of partially treated with disinfection sewage to the Hudson River	980,000	Hudson River
<b>Total (gallons)</b>			<b>2,270,000</b>	

27. According to the NYAlert database, in the past five (5) years the County has reported seven (7) Sanitary Sewer Overflows (SSOs) from the County's SSS that resulted in a discharge of untreated sewage to a waterbody from an unpermitted location. Details regarding the seven (7) reported SSOs are summarized in the Table below:

<b>Date</b>	<b>Location</b>	<b>Description</b>	<b>Gallons (estimated)</b>	<b>Receiving Waterbody</b>
06/09/2014	Dock St and VanDer Donck, Yonkers	Sewer Pipe Break	Unknown	Saw Mill/Hudson River
06/10/2014	2 Alexander St, Yonkers	Blockage	Unknown	Hudson River
07/17/2014	1025 Warburton Avenue, Yonkers	Blockage	Unknown	Hudson River
10/24/2014	Garden Avenue Extension (Hutchinson Pump Station), Mount Vernon	Gate valve accidentally shut by contractor without operator's knowledge	24,000	Hutchinson River
04/28/2017	Saw Mill River Parkway (Mt Kisco force main)	Force main damaged by a construction contractor	1,000	Storm drain, unknown

05/15/2017	Saw Mill River Parkway (Mt Kisco force main)	Force main crack, possibly due to construction activity	15,000	Ground, unknown
1/7/2019	Saw Mill River Parkway, New Castle (Mt Kisco force main)	Air release valve leaked sewage into adjacent wetland	9,000	Wetland
		<b>Total (gallons)</b>	<b>49,000</b>	

#### **Control of Floatable and Settleable Solids:**

28. According to County representatives, the City of Yonkers is responsible for street sweeping and catch basin cleaning within the portions of the combined sewer collection system within the City of Yonkers.
29. The County has two (2) CSO swirl concentrators that remove floatables and settleable solids from CSO discharges, as discussed previously.

#### **Sewage Backups:**

30. According to County representatives, in response to residential complaints concerning the County owned and operated collection system, the County completes a form located in the CMOM which is then scanned and maintained digitally. According to County representatives, the County rarely receives residential backup complaints due to the lack of direct residential connections to the County's collection system.

#### **Septage and Hauled Waste:**

31. The County accepts septage at the Hawthorne Receiving Station upstream from the North Yonkers Pumping Station. According to County representatives, when the flow rate at the North Yonkers pumping station reaches 50 million gallons per day (MGD), a phone notification is sent and the gate at the Hawthorne Receiving Station gate is closed, prior to a CSO discharge at 70 MGD. The County's SPDES permit states that the County shall suspend receipt of septage waste at the Hawthorne Receiving Station when flow at the North Yonkers Pumping Station reaches 50 MGD.

#### **Public Notification:**

32. According to County representatives, the County has installed CSO outfall signs at each of the CSO outfall locations.
33. The County utilizes the NYAlert system to report CSO overflow events and dry weather overflows which are then reported to the public.

#### **CSO BMP Annual Report:**

34. EPA obtained copies of the City's CSO BMP Annual Reports for 2017 and 2018.
35. The County reported the following in the 2018 CSO BMP Annual Report:

CSO Outfall #	No. of overflow events		Total annual CSO volume discharged (MG)		Total annual volume capture or diverted to POTW (MG)		Estimated or measured?
	2017	2018	2017	2018	2017	2018	
002	5	5	4.19	20.07	7.48	37.55	Flow Meter
003	16	10	67.27	166.45	204.15	390.58	Flow Meter
008, 010, 014, 015, 016, 017, 018, 021, 022, 025, 030							Not measured
Total	21	15	71.46	186.52	211.63	428.13	

### **Long Term Control Plan (LTCP):**

36. The County's LTCP had been developed, approved by NYSDEC and construction was completed in 1995. The County is currently in the Post-Construction monitoring phased of the LTCP.

### **NYSDEC Enforcement Actions:**

37. On October 24, 2016, the NYSDEC executed an Order on Consent (R3-20150619-60) with Westchester County for violations of the CWA including receiving septage waste at the Hawthorne Receiving Station manhole while flow capacity had been reached at the North Yonkers Pump Station during a combined sewage overflow event.
38. On April 28, 2017, the NYSDEC issued a Notice of Violation to WCDEF regarding the sanitary sewage overflow event that occurred on April 22, 2017 at 19-35 Alexander Street in North Yonkers for inaccurately reporting the dry weather event as a CSO.
39. On December 14, 2018, the NYSDEC issued a Notice of Violation to WCDEF regarding the sanitary sewage overflow event that occurred on November 30, 2018 at the North Yonkers pump station for the dry weather discharge and for failing to collect grab samples after the first half hour of the discharge, as required by the permit.

### **CLOSING:**

At the conclusion of the inspection, Ms. Kimberly McEathron, of EPA Region 2, held a closing conference with Mr. Facelle to discuss the preliminary findings and observations of the inspection.

### **III. POTENTIAL NONCOMPLIANCE ITEMS:**

1. Permit Limits, Levels and Monitoring – North and South Swirls on page 7 of the Permit includes effluent limits for Outfalls 002 and 003. According to the County's submitted Discharge Monitoring Reports (DMRs), effluent limitations were exceeded on three (3) occasions for Outfall 002 and on four (4) occasions for Outfall 003, in the past five (5) years (see Table 1).
2. Best Management Practices for Combined Sewer Overflows (BMPs for CSOs) Number 1: CSO Maintenance/Inspection on page 15 of the Permit requires the County to conduct routine inspections of CSO structures, including weekly CSO regulator inspections and maintenance. CSO regulator weirs have

not been adequately inspected or maintained by County personnel, based on EPA observations at the time of the inspection and documentation provided by the County, as detailed below:

- a. County personnel were unable to locate the Ashburton (010) regulator weir structure and were unable to access the Ashton (020) regulator weir structure, at the time of the inspection (see photograph DSCN3178);
  - b. Ashburton (010) regulator chamber was filled with debris and contained a high level of water/sewage in addition to an indication of tidal intrusion of river water at this location (see photographs DSCN3171 and DSCN3173);
  - c. Wells Avenue (025) tide gate contained debris and tidal intrusion was observed flowing over the regulator weir and into the collection system at the time of the inspection (see photographs DSCN3160 and DSCN3162);
  - d. Due to the condition and the amount of material observed, the Wells Avenue and Ashburton Avenue regulator structures must not have been maintained since the last CSO event, which was on January 24, 2019, twenty (20) days prior to EPA's inspection; and
  - e. Regulator and tide gate inspection records from January 2017 through February 2019 provided by the County did not include observations or a notation for regulator structures where tide gates are located and only include notations that the tide gates had been inspected.
3. BMPs for CSOs Number 1: CSO Maintenance/Inspection on page 15 of the Permit states that regulator inspection reports shall be completed indicating visual inspection, any observed flow, incidence of rain or snowmelt, condition of equipment and work required. Upon review of the regulator inspection reports provided by the County from January 2017 through February 2019, only six (6) of the 109 reports included incidence of rain or snowmelt and none of the reports included documentation of any observed flow. In addition, the reports do not document a visual inspection or condition of the regulators other than a check mark for the regulators without tide gates and for the five (5) regulators with tide gates the only notation is whether the tide gate is closed and do not include a note specific to observations of the regulators themselves. On March 3, 2019, the County provided EPA with an updated regulator and tide gate inspection form that incorporated the additional permit required elements, such as weather and flow conditions and regulator observations.
4. BMPs for CSOs Number 2: Maximum Use of Collection System for Storage on page 15 of the Permit requires the County to utilize the maximum amount of in-system storage capacity to minimize CSOs. In addition, page 1 of the Permit requires the County to comply with 6 NYCRR Part 750-1.2(a) and 750-2 which requires the County to, at all times, properly operate and maintain all disposal facilities, which are installed or used by the permittee to achieve compliance with the conditions of the permit. At the time of the inspection, EPA identified the following instances of inadequate operation and maintenance of disposal facilities and potential reductions in-system storage capacity:
  - a. According to County representatives, there are portions of the County's trunk sewers in the combined sewer area that have never been inspected or maintained to their knowledge, this includes 850 feet of trunk sewer in "South Yonkers C" and 11,879 feet of trunk sewer in "North Yonkers (CSO Area)"; and
  - b. At the time of the inspection, EPA observed tidal water from the Hudson River entering the collection system at Wells Avenue (025) and Ashburton Avenue (010) regulators (see photographs DSCN3160 and DSCN3162). According to County representatives, the metal tide gates need to be replaced, do not seal completely and that the County has started the process to replace tide gates at all five (5) locations.



5. BMPs for CSOs Number 6: Prohibition of Dry Weather Overflow on page 16 of the Permit prohibits dry weather overflows (DWOs). The County reported to the State, three (3) DWO discharges from its system in the past five (5) years, resulting in the discharge of approximately 2,270,000 gallons of partially treated sewage to the Hudson River during dry weather.
6. BMPs for CSOs Number 13: Public Notification on page 17 of the Permit requires the County to install and maintain identification signs at all CSO outfalls owned and operated by the County and to ensure that they are easily readable by the public. At the time of the inspection, County representatives stated that identification signs for CSO Outfalls 025 (Wells Avenue) and 010 (Ashburton Avenue) had been removed due to construction activity in the immediate areas (see photograph DSCN3163).
7. Discharge Notification Requirements on page 19 of the Permit states that the County shall periodically inspect the outfall identification sign(s) in order to ensure they are maintained, are still visible, and contain information that is current and factually correct. In addition, the County shall retain records for a minimum period of 5 years in accordance with 6 NYCRR Part 750-1.12(b)(2) and Part 750-2.5(c)(1). According to County representatives, outfall signs are inspected annually, however, the County was unable to provide documentation of previously conducted annual CSO outfall sign inspections. The County was able to provide one (1) work order documenting that the bypass outfall sign for the Dobbs Ferry pumping station Bypass Outfall 004 had been removed and replaced.
8. Page 2 of the Permit states that bypasses from seven (7) bypass outfalls are not allowed except in accordance with regulations at 6 NYCRR Part 750-2.8(b)(2). In addition, page 1 of the Permit requires the County to comply with 6 NYCRR Part 750-1.2(a) and 750-2 which requires the County to, at all times, properly operate and maintain all disposal facilities, which are installed or used by the permittee to achieve compliance with the conditions of the permit. Observation at the time of the inspection indicate that the County has not adequately inspected or maintained the bypass outfalls as detailed below:
  - a. At the time of the inspection, the County representatives were unsure of the configuration, position and location of each of the bypass outfalls listed in the Permit;
  - b. County representatives stated that the bypass outfalls are valved (except for Bypass Outfall 005) but were unaware of the condition or location of the valves; and
  - c. County representatives were unable to demonstrate that the bypass outfalls and associated valves had been inspected, maintained or monitored to ensure that no discharges occur or had occurred in the past.
9. Page 1 of the Permit requires the County to comply with 6 NYCRR Part 750-1.2(a) and 750-2 which requires the County to, at all times, properly operate and maintain all disposal facilities, which are installed or used by the permittee to achieve compliance with the conditions of the permit. According to County representatives, air release valves associated with County force mains are scheduled to be inspected and exercised at least annually. However, according to work orders provided by the County, air release valves were not inspected and exercised in 2018, except for the Mount Kisco pump station force main.
10. The Clean Water Act (CWA) prohibits persons from discharging pollutants from a point source to a water of the United States, except in compliance with a NPDES/SPDES permit. The County reported to the State, seven (7) Sanitary Sewer Overflow (SSO) discharges from its system in the past five (5) years, resulting in the discharge of approximately 49,000 gallons of untreated sewage to waterbodies, the Hudson River, Hutchinson River and Saw Mill River. Each of these SSO discharges are not permitted by a NPDES/SPDES permit.

#### **IV. AREAS OF CONCERN**

1. The County does not currently have a system in place to know when CSO outfalls discharge, except for the monitoring conducted at the two (2) CSO swirls.
2. At the time of the inspection, EPA inspector McEathron observed that the soil adjacent to the CSO Outfall 030 channel had eroded and was undermining a fence post (see photograph DSCN3190). After the inspection, the County had placed large stones around the fence post, according to the County's February 22, 2019 email.
3. According to County representatives, the County is responsible for the regulator and tide gate structures associated with CSO discharges in the City of Yonkers, however, the County does not own or operate the pipe associated with the outfall and therefore is not inspecting or overseeing CSO outfall structures and it's unclear if the City is inspecting or maintain these outfall structures. In addition, the County and the City do not have an intermunicipal agreement regarding the maintenance of these interconnected structures and the City of Yonkers was not involved in the development of the County's LTCP despite being the source of the combined sewage flow.
4. At the time of the inspection, the County's SCADA system indicated numerous active alarms, including fifty (50) active alarms at the Tarrytown Pump Station. According to County representatives, the County contractor still needs to finish setting up the system.
5. As a result of the inspection, EPA noted the following aspects of the Permit that the County should work with NYSDEC to resolve and clarify when drafting a future permit:
  - a. Page 2 of the Permit includes a table titled "List of Additional Discharge Outfalls" which includes permitted CSO Outfalls. According to County representatives, each of the CSO Outfalls on Page 2 have a regulator associated with them that are not specified in the Permit.
  - b. Page 3 of the Permit includes a table titled "Regulators Tributary to Combined Sewer Outfalls". According to County representatives, the regulators listed in this table are an additional nine (9) "high level" regulators that are upstream of other regulators and do not directly discharge into a waterbody.

#### **V. ATTACHMENTS:**

Table 1: Effluent Limit Exceedances (Outfalls 002 & 003)

Photograph Log

Photographs

**Table 1: Effluent Limit Exceedances (Outfalls 002 & 003)**

<b>Outfall</b>	<b>Parameter</b>	<b>Monitoring Period End Date</b>	<b>Permit Limit</b>	<b>Reported Value</b>	<b>Units</b>	<b>Exceedance (%)</b>
002	Oil petroleum, total	12/31/2014	15	18	mg/L	20
002	Oil & Grease	2/29/2016	40	155	mg/L	288
002	Oil petroleum, total	5/31/2017	15	27	mg/L	80
003	Coliform, fecal general	7/31/2014	2,400	36,000	#/100mL	1,400
003	Coliform, fecal general	5/31/2015	2,400	7,200	#/100mL	200
003	Coliform, fecal general	7/31/2016	2,400	12,000	#/100mL	400
003	Coliform, fecal general	12/31/2018	2,400	24,600	#/100mL	925

**Photograph Log – WCDEF - Yonkers SSS and CSS CEI Unedited Photographs Taken February 13, 2019 by Kimberly McEathron with Nikon Coolpix AW100 digital camera**

<b>File Name</b>	<b>Description</b>
DSCN3148	North Yonkers pump station bar screens
DSCN3149	North Yonkers pump station grit removal
DSCN3150	Alexander pump station pumps
DSCN3151	North Yonkers pump station overflow weirs
DSCN3152	North Yonkers pump station pumps
DSCN3153	North Yonkers pump station seal water tank
DSCN3154	North Yonkers pump station swirl concentrator
DSCN3155	North Yonkers screenings removal area with trench drain
DSCN3156	North Yonkers screenings removal area with trench drain
DSCN3157	Outfall 003 sign
DSCN3158	Backup power generator at the North Yonkers pump station
DSCN3159	Wells Avenue (025) regulator chamber
DSCN3160	Wells Avenue (025) regulator weir with river water flowing into system
DSCN3162	Tide gate covered with debris and high river water at Wells Avenue (025) regulator
DSCN3163	CSO outfall 025 sign not visible due to construction activities
DSCN3164	Main Street (022) regulator chamber
DSCN3165	Main Street (022) regulator chamber
DSCN3166	Main Street (022) regulator chamber
DSCN3167	Main Street (022) tide gates
DSCN3168	Main Street (022) regulator chamber
DSCN3169	CSO Outfall (022) sign visible
DSCN3170	Ashburton (010) regulator chamber
DSCN3171	Ashburton (010) regulator chamber filled with debris and high level of water/sewage, weir not observed due to unknown location and high level
DSCN3173	Ashburton (010) tide gate with debris stuck in gate
DSCN3174	Manhole near Ashburton (010) regulator chamber
DSCN3175	Additional manhole near Ashburton (010) regulator chamber
DSCN3178	Ashton (020) regulator, weir not observed because unable to open hatch
DSCN3179	Ashton (020) regulator chamber with high flow
DSCN3180	South Yonkers Screening Facility bar racks
DSCN3182	South Yonkers Screening Facility swirl concentrator
DSCN3183	Valentine Lane (027) regulator chamber sign
DSCN3184	Valentine Lane (027) regulator chamber
DSCN3185	Valentine Lane (027) regulator weir
DSCN3186	Valentine Lane (027) regulator weir
DSCN3187	Adjacent stream with flow near regulator chamber
DSCN3188	CSO Outfall (030) sign visible
DSCN3189	CSO Outfall (030) discharge channel
DSCN3190	Fence post undermined at CSO Outfall 030

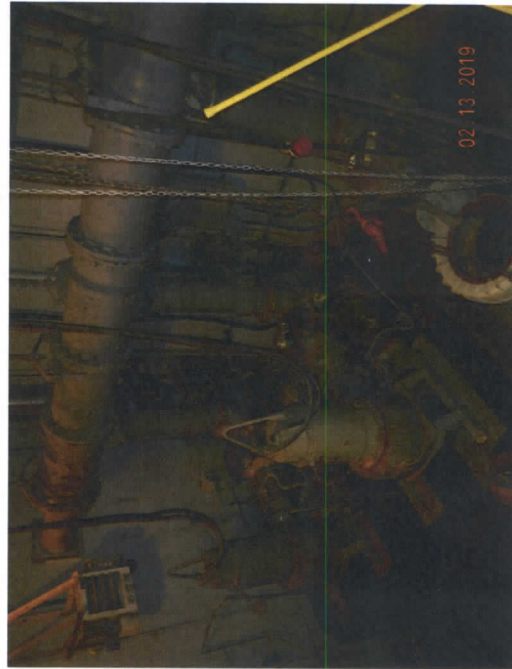




DSCN3148



DSCN3149



DSCN3150



DSCN3151





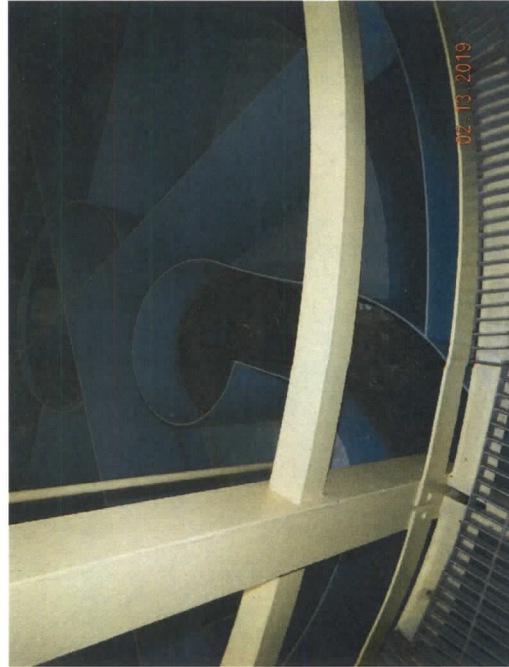
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DSCN3152



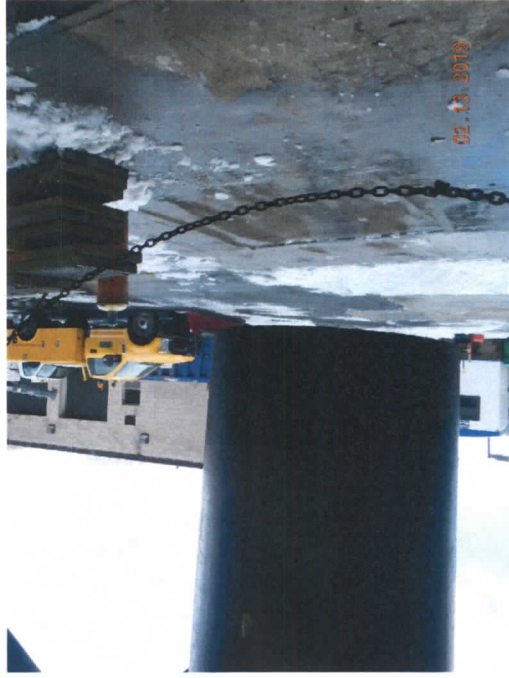
02.13.2019

DSCN3153



02.13.2019

DSCN3154



02.13.2019

DSCN3155

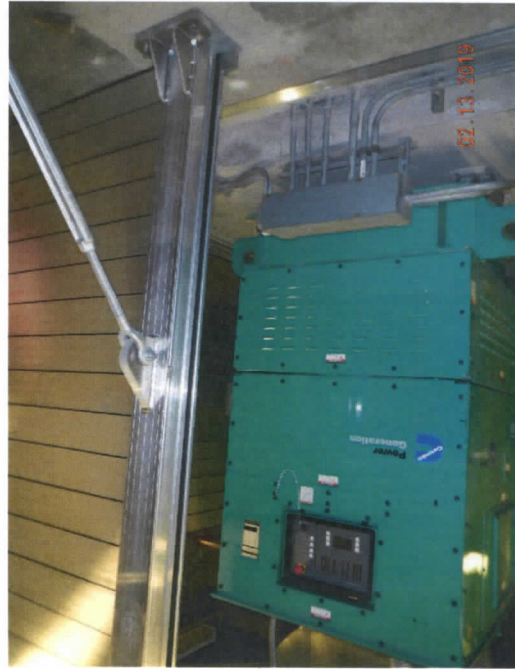




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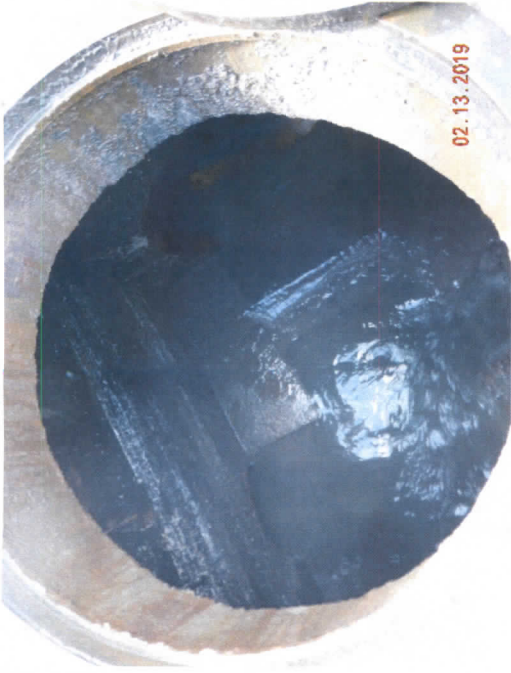
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DSCN3158



DSCN3159



DSCN3160



DSCN3162



DSCN3163



DSCN3164

WCDEF Yonkers SSS/CSS CEI Photographs Taken 2/13/2019





DSCN3165



DSCN3166



DSCN3167



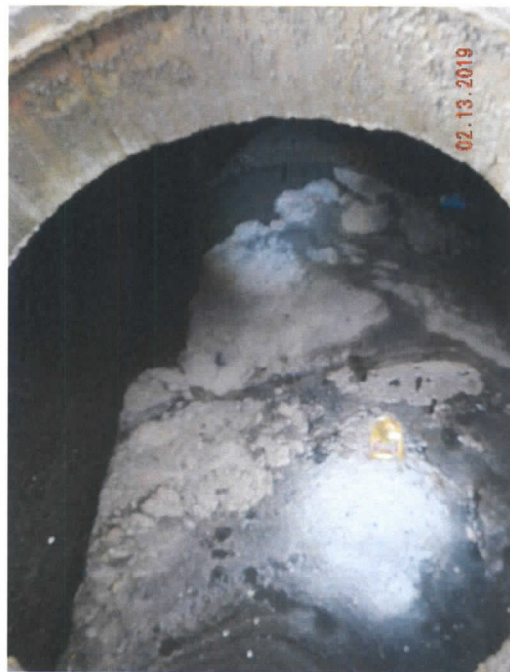
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DSCN3169



DSCN3170



DSCN3171



DSCN3173





DSCN3174



DSCN3175



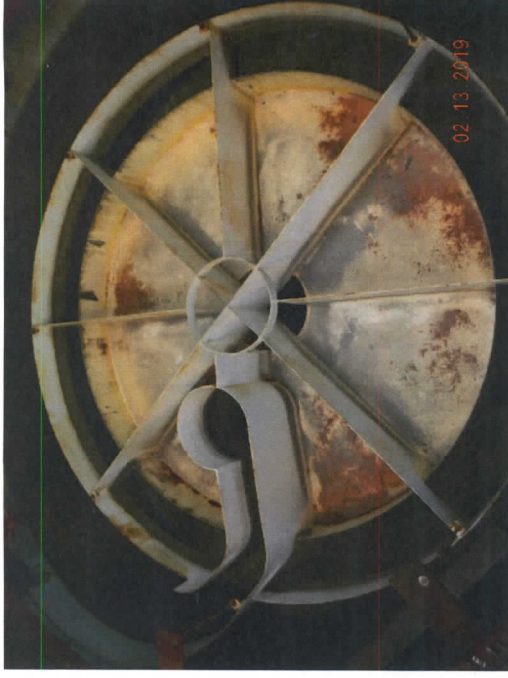
DSCN3178



DSCN3179



DSCN3180



DSCN3182



DSCN3183



DSCN3184





DSCN3185



DSCN3186



DSCN3187



DSCN3188



DSCN3189



DSCN3190



DSCN3191